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TIKTOK INC. and BYTEDANCE INC.

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

IN RE: SOCIAL MEDIA ADOLESCENT
ADDICTION/PERSONAL INJURY
PRODUCTS LIABILITY LITIGATION,

Case No. 4:22-MD-03047-YGR

MDL No. 3047

This Document Relates to:

Personal Injury Bellwether Plaintiffs

**DECLARATION OF JORI M. LOREN
IN RESPONSE TO MAGISTRATE
JUDGE KANG'S MAY 30, 2025 ORDER**

Judge: Hon. Yvonne Gonzalez Rogers

Magistrate Judge: Hon. Peter H. Kang

DECLARATION OF JORI M. LOREN

Pursuant to 28 U.S.C. § 1746, I, Jori M. Loren, declare as follows:

1. I am an attorney at Faegre Drinker Biddle & Reath LLP, and counsel for Defendants TikTok Inc. and ByteDance Inc. in the above-referenced matter. I make this declaration in response to the Court's May 30, 2025 Order regarding the parties' Joint Letter Brief regarding ESI requested from certain Bellwether Plaintiffs (Dkt. 1957). I have personal knowledge of the following facts and, if called as a witness in the above-referenced action, could competently testify to the matters stated herein.

2. Attached hereto as **Exhibit A** is a true and correct copy of a March 26, 2025 email sent by my colleague, Nikolas Spilson, that requested documents from certain data sources used by Plaintiff Klinten Craig.

3. Attached hereto as **Exhibit B** is a true and correct copy of a March 26, 2025 email sent by Jesse S. Krompiew of Morgan, Lewis, & Bockius LLP that requested documents from certain data sources used by Plaintiff Leslie Smith.

4. Attached hereto as **Exhibit C** is a true and correct copy of a March 26, 2025 email sent by Haley R. Klein of Kirkland & Ellis that requested documents from certain data sources used by Plaintiff David Melton.

5. Attached hereto as **Exhibit D** is a true and correct copy of a March 27, 2025 email sent by my colleague, Thomas R. Prible, that requested documents from certain data sources used by Plaintiff Dymand McNeal.

6. Attached hereto as **Exhibit E** is a true and correct copy of a March 27, 2025 email sent by my colleague, Emma DeLaney Strenski, that requested documents from certain data sources used by Plaintiff Jessica D'Orazio.

7. Attached hereto as **Exhibit F** is a true and correct copy of a March 27, 2025 email sent by James R. Hampton of Shook, Hardy & Bacon LLP that requested documents from certain data sources used by Plaintiff M.G.

8. Attached hereto as **Exhibit G** is a true and correct copy of a March 28, 2025 email sent by Cara Souto of Covington & Burling LLP that requested documents from certain data sources used by Plaintiff Laurel Clevenger.

9. Attached hereto as **Exhibit H** is a true and correct copy of a March 28, 2025 email sent by Stephanie Schuster of Morgan, Lewis, & Bockius LLP that requested documents from certain data sources used by Plaintiff J.D.

10. Attached hereto as **Exhibit I** is a true and correct copy of a March 28, 2025 letter from me that, among other things, requested documents from certain data sources used by Plaintiff Nuala Mullen.

